

# EXHIBIT D

1 Samantha M. Froelich

2 like to start helping, aiding in the process  
3 of de-radicalizing other people.

4 Q. And why is that something that you  
5 want to do?

6 A. I think it's important to know  
7 that ideology can be condemned, but people  
8 until they take certain action and do it with  
9 no remorse, no person should be condemned.  
10 Everyone should have a chance at redemption.  
11 If I were to condemn everyone in the  
12 Alt Right, all of these people, anyone that I  
13 know as -- as, you know, less than or subhuman  
14 or trash or whatever, I would also be  
15 condemning myself. And I am living proof that  
16 it's possible. I -- I don't want to leave  
17 anyone else out of that.

18 MR. BLOCH: I have nothing further.

19 MS. PHILLIPS: Mike, you want to ask  
20 them on the phone if they have anything?

21 MR. BLOCH: Does defense counsel on  
22 the phone have any questions?

23 MR. KOLENICH: Yes, I have one or  
24 two questions. Thank you.

25 COURT REPORTER: Who's speaking?

1 Samantha M. Froelich

2 MS. PHILLIPS: Who is that? Sorry.

3 MR. KOLENICH: Sorry. This is Jim

4 Kolenich representing -- or one of the

5 attorneys representing Identity Evropa.

6 EXAMINATION

7 BY MR. KOLENICH:

8 Q. Ma'am, earlier you testified

9 regarding the phrase "Holohoax."

10 Do you recall that?

11 A. Yes.

12 Q. So is it fair to say that your

13 answer was that it meant that not enough -- or

14 one of the things it meant was that not enough

15 Jews had been killed during World War II?

16 A. I'm sorry. Can you -- can you

17 rephrase that?

18 Q. Yes. I understood you to say that

19 one of the meanings for Holohoax among the

20 Alt Right was that not enough Jews had been

21 killed during the Holocaust; is that accurate?

22 A. One of the interpretations of the

23 word "Holohoax" is that not enough Jews were

24 killed during World War II.

25 Q. Now, is it your testimony that one

1 Samantha M. Froelich  
2 of the goals of Identity Evropa when you were  
3 a member was to murder Jews?

4 A. That is not my testimony.

5 Q. Okay. So to be clear, what did  
6 Identity Evropa members or any Alt Right  
7 member mean by not enough Jews were killed?

8 A. When I had first joined, I was  
9 talking to someone in Identity Evropa and they  
10 had said to me that one of the slogans that  
11 you get used to is, "Welcome to the Alt Right  
12 where the Holocaust never happened, but we  
13 want it to happen again."

14 Q. Okay. I understand that. And  
15 there's an awful lot of questionable lingo in  
16 the Alt Right, I think we can all agree, but,  
17 to your knowledge, and for the record, there  
18 never was any actual plan to harm or kill Jews  
19 among members of Identity Evropa; is that  
20 accurate?

21 A. I never saw a listed or tangible  
22 plan, no.

23 MR. BLOCH: I object to form on that  
24 last question.

25 BY MR. KOLENICH:

1 Samantha M. Froelich

2 Q. And was there any plan to harm or  
3 kill any other racial or religious minority?

4 MR. BLOCH: Object to form.

5 THE WITNESS: Do I still have to  
6 answer?

7 MR. BLOCH: Yes.

8 THE WITNESS: I'm sorry. Can you  
9 repeat that? Sorry.

10 BY MR. KOLENICH:

11 Q. Was there any plan among Identity  
12 Evropa to harm or kill any other racial or  
13 religious minority?

14 MR. BLOCH: Object to form.

15 THE WITNESS: I did not see any  
16 plans for that.

17 BY MR. KOLENICH:

18 Q. Thank you. Now, you testified  
19 earlier that you were at Richard Spencer's  
20 home during which time there was some planning  
21 for Unite the Right; is that accurate?

22 A. Yes.

23 Q. Did you call the police and report  
24 any of this planning?

25 A. No.

1 Samantha M. Froelich

2 Q. Since Unite the Right, have you  
3 called the police and reported anyone for the  
4 commission of a crime?

5 A. I am in touch with law  
6 enforcement.

7 Q. Okay. Thank you.

8 Earlier you testified that members  
9 of Identity Evropa would have been very  
10 comfortable forcing people out of their homes;  
11 is that right?

12 A. I never said that.

13 MR. BLOCH: Object to form.

14 BY MR. KOLENICH:

15 Q. Okay. So, to your knowledge, no  
16 member of Identity Evropa ever said they would  
17 be comfortable forcing American citizens out  
18 of their homes?

19 MR. BLOCH: Object to form.

20 THE WITNESS: No.

21 MR. KOLENICH: Okay. Thank you very  
22 much. I have no further questions.

23 MR. BLOCH: All right. Nothing from  
24 Mr. Campbell?

25 (No reply.)